

June 5, 2023

VIA EMAIL (SMCowley@duanemorris.com)

Steven M. Cowley, Esq.
Duane Morris LLP
100 High Street, Suite 2400
Boston, Massachusetts 02110

Re: *Michael Grecco Productions, Inc. v. Alamy Inc. et al.*, No. 1:18-cv-03260 (PKC)(RER)

Dear Mr. Cowley,

On behalf of defendants Alamy Inc. and Alamy Ltd. (collectively, “Defendants”) in the above-captioned matter, enclosed please find the following papers related to Defendants’ Motion for Summary Judgment:

- Defendants’ Notice of Motion for Summary Judgment;
- Defendants’ Memorandum of Law in Support of their Motion for Summary Judgment;
- Defendants’ Statement of Undisputed Material Facts Pursuant to Local Civil Rule 56.1;
- Declaration of James Allsworth and Supporting Exhibits;
- Declaration of Nancy E. Wolff and Supporting Exhibits; and
- [Proposed] Order and Judgement Granting Defendants’ Motion for Summary Judgement.

Defendants further note that certain documents produced during discovery and cited in their Motion for Summary Judgment have been designated either as “Confidential” or “Attorneys’ Eyes Only.” The documents listed on Exhibit A attached hereto have been designated “Attorneys’ Eyes Only” and shall be treated as such and in accordance with the parties’ protective order (ECF No. 97). Defendants reserve their right to seek leave to file documents designated either as “Confidential” or “Attorneys’ Eyes Only” under seal when they electronically file their Motion for Summary Judgment with the Court.

Sincerely,

/s/ Nancy E. Wolff

COWAN, DeBAETS, ABRAHAMSON
& SHEPPARD LLP

Nancy E. Wolff
Scott J. Sholder
CeCe M. Cole
nwolff@cdas.com
ssholder@cdas.com
ccole@cdas.com

*Attorneys for Defendants
Alamy Inc. and Alamy Ltd.*

cc: Honorable Pamela K. Chen (via ECF without enclosures)
Counsel of Record (via email with enclosures)